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August 30, 2024

VIA ECF

The Honorable Robyn F. Tarnofsky
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 9B
New York, NY 10007

Re: Parker v. Bursor, Civil Case No. 24 Civ. 245 (JGLC)(RFT)

Dear Judge Tarnofsky:

We represent Plaintiff Angelica Parker in the above-referenced action and write jointly with Defendants Scott Bursor and Bursor & Fisher, P.C. to provide an update on the status of discovery.

As of today, both parties have exchanged discovery requests, responses to those requests, initial productions, deficiency letters, and third-party document subpoenas. We are engaged in ongoing meeting and conferring in an effort to resolve our disputes. There is a dispute as to the scope of discovery (which also implicates the subpoenas served by Defendants) that we will bring to Your Honor for review imminently. Discovery is on track to close at the current deadline of November 29, 2024. The Parties will promptly advise the Court if they believe the Court's assistance is required on any issue.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M.J. Willemin".

Michael J. Willemin for Plaintiff

A handwritten signature in black ink, appearing to read "Christine A. Amalfe".

Christine A. Amalfe for Defendants